



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 15, 2022

VIA ECF

Hon. P. Kevin Castel
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: *Rahman, et al. v. Mayorkas, et al.*, No. 21 Civ. 10707 (PKC)

Dear Judge Castel:

This Office represents the government in this action in which the plaintiffs seek an order compelling U.S. Citizenship and Immigration Services ("USCIS") to adjudicate their Application to Register Permanent Residence or to Adjust Status (Form I-485) and Refugee/Asylee Relative Petitions (Forms I-730). On behalf of the government, I write respectfully to request an on-consent extension of time of sixty days to respond to the complaint (*i.e.*, from April 18, 2022, to June 17, 2022). I also respectfully request that the Court adjourn the initial conference presently scheduled for May 6, 2022 to the week of June 27 or thereafter.

I request this extension and adjournment because USCIS is still in the process of transferring the necessary files to the appropriate field office for further action since the adjudication of the Forms I-730 is dependent on review of the file containing the Form I-485, and then the files must be transferred again for the adjudication of the I-485. The additional time is thus needed for the field office to evaluate the plaintiffs' application and petitions and determine next steps, which may include taking adjudicative action such as the issuance of Requests for Evidence or interview notices. This is the government's second request for an extension of the deadline to respond to the complaint and an adjournment of the initial conference; the Court granted the first request. The plaintiffs consent to these requests.

*Time to respond
extended to June 17.
Conference adjourned
from May 6 to
July 8 at 10:30 AM
SO ORDERED
VSDJ
4-19-22*

I thank the Court for its consideration of this letter.

Respectfully submitted,

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United States Attorney

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cc: Counsel of record (via ECF)